

TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.
ATTORNEYS AT LAW
40 EXCHANGE PLACE
18TH FLOOR
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE
(212) 482-1303 FAX
WWW.TALKINLAW.COM
EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:
5100 DORSEY HALL DRIVE
SUITE 100
ELLIOTT CITY, MD 21042
410-964-0300

April 1, 2019

NEW JERSEY OFFICE:
2500 PLAZA 5
HARBORSIDE FINANCIAL CENTER
JERSEY CITY, NJ 07311
201-342-6665

Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

Re: United States v. Ali Hamilton et al.
15 Cr. 854 (SHS)

Dear Judge Stein:

Defendant Ali Hamilton (“Hamilton”) is scheduled to be sentenced by the Court on April 25, 2019. I recently concluded a nine-week trial and since that date have prepared and filed several lengthy motions that were immediately due. The post-trial motions in recently concluded trial are due in the near future and require my immediate attention. For this reason, I respectfully request an adjournment of Hamilton’s sentencing hearing to a date on or between May 21, 2019 May 24, 2019 or a date thereafter that is convenient to the Court to allow for preparation of defendant’s sentencing memorandum. The government, by Assistant United States Attorney Maurene Comey, consents to this application.

Thank you for Your Honor’s patience and consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Maurene Comey (by ECF)
AUSA Jacob Warren (by ECF)